

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON :
SEPTEMBER 11, 2001 : **03-MDL-1570 (GBD)(SN)**

This Document Relates To:

Mindy Kleinberg, Individually as Spouse and as Personal Representative of the Estate of Alan D. Kleinberg, deceased; Lauren Nicole Kleinberg, Individually as Surviving Child of Alan D. Kleinberg, deceased; and Jacob Kleinberg, Individually as Surviving Child of Alan D. Kleinberg, deceased; and Sam Eric Kleinberg, Individually as Surviving Child of Alan D. Kleinberg, deceased only in the case of Thomas E. Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.; Case No.: 1:15-cv-09903 (GBD) (SN) (SDNY)

UNOPPOSED MOTION TO SUBSTITUTE COUNSEL

COME NOW, Mindy Kleinberg, individually and as spouse and Personal Representative of the Estate of Alan D. Kleinberg, deceased; Lauren Nicole Kleinberg, individually as surviving child of Alan D. Kleinberg, deceased; Jacob Kleinberg, individually as surviving child of Alan D. Kleinberg, deceased; and Sam Eric Kleinberg, individually as surviving child of Alan D. Kleinberg, deceased (“the Kleinberg Plaintiffs”), Plaintiffs in *Thomas E. Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*; Case No. 1:15-cv-09903 (GBD) (SN) (SDNY), and bring this Unopposed Motion to Substitute Counsel. As grounds for said Motion, the Kleinberg Plaintiffs state as follows:

1. The Kleinberg Plaintiffs request the Court to grant permission for John Michael Eubanks and Robert Turner Haefele of Motley Rice LLC to withdraw and to substitute Dennis G. Pantazis as attorney of record as to the Kleinberg Plaintiffs *only*.

2. The Kleinberg Plaintiffs have retained Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC to represent them in this matter.

3. The Kleinberg Plaintiffs, John Michael Eubanks and Robert Turner Haefele, and Dennis G. Pantazis consent to the substitution of counsel as requested herein (signed Consents attached hereto as Exhibit A).

4. The parties anticipate after substitution of counsel is granted, they will move the Court to separate the Kleinberg Plaintiffs into a separate case.

WHEREFORE, PREMISES CONSIDERED, Mindy Kleinberg, individually and as spouse and Personal Representative of the Estate of Alan D. Kleinberg, deceased; Lauren Nicole Kleinberg, individually as surviving child of Alan D. Kleinberg, deceased; Jacob Kleinberg, individually as surviving child of Alan D. Kleinberg, deceased; and Sam Eric Kleinberg, individually as surviving child of Alan D. Kleinberg, deceased, pray that this Honorable Court enter an Order allowing John Michel Eubanks and Robert Turner Haefele of Motley Rice LLC to withdraw from representing the Kleinberg Plaintiffs and to substitute Dennis G. Pantazis of Wiggins Childs Pantazis Fisher Goldfarb LLC as attorney of record for the Kleinberg Plaintiffs *only* in *Thomas E. Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.*; Case No. 1:15-cv-09903 (GBD) (SN) (SDNY).

RESPECTFULLY SUBMITTED,

/s/ Dennis G. Pantazis
Dennis G. Pantazis

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